



OFFICE OF RACIAL EQUITY AND SOCIAL JUSTICE

Marc Elrich
County Executive

Tiffany Ward
Director and Chief Equity Officer

MEMORANDUM

April 28, 2023

To: Jennifer Bryant, Director
Office of Management and Budget

From: Tiffany Ward, Director
Office of Racial Equity and Social Justice 

Re: Racial Equity Impact Assessment (REIA) Supplemental Appropriation (SA) #23-85 –
FY23 Operating Budget Individuals with Disabilities Education Act (IDEA) Part B
Grant

- I. **FINDING:** The Office of Racial Equity and Social Justice (ORESJ) finds that Supplemental Appropriation #23-85 – *FY23 Operating Budget Individuals with Disabilities Education Act (IDEA) Part B Grant* – has the potential to advance equity for students with disabilities in the County, however, the absence of data makes it difficult to determine to what extent this supplemental will also advance racial equity. Supporting the salaries and associated employee benefits of the instructors, social workers, and psychological services provided by the grant will ultimately benefit children and families supported by IDEA Part B as Montgomery County Public Schools (MCPS) will be able to attract and retain a high-quality, culturally competent workforce equipped to meet the special education needs of diverse students in the County. However, while bolstering instructional capacity is vital to addressing disparities in student opportunities and outcomes, a clear link to structures, policies, and practices must be accompanied by data collection and monitoring that lend themselves to continual staff development and resources that explicitly address students with special learning needs who identify as Black, Indigenous, or People of Color (BIPOC).
- II. **BACKGROUND:** The primary purpose of Supplemental Appropriation #23-85 – FY23 Operating Budget Individuals with Disabilities Education Act (IDEA) Part B Grant is to provide funding in the amount of \$1,629,727 to MCPS in an effort to improve educational services for students with disabilities. Specifically, the funds will be used to support the salaries and employee benefits of special education instructors, social workers, and

psychological services for school-aged children (ages 3 through 21 years of age) with developmental disabilities¹. In addition to funding instructional services, the grant can also be used to fund additional services, materials, and supplies for these same students. Supplemental information accompanying the funding request states the potential benefits of the grant to MCPS students and families enrolled in special education programs supported by IDEA Part B include staff trained in culturally responsive best practices that have the potential to mitigate racial inequities. This statement was made without the inclusion of supporting documentation to verify this claim making it difficult to assess potential benefits to BIPOC students with disabilities in the County.

ORESJ has previously documented inequities in educational opportunity and resources impacting the experiences of students with mental and behavioral health needs in Montgomery County in the following Racial Equity Impact Assessments (REIAs):

1. REIA of Supplemental Appropriation #22-24 High-Quality Early Childhood Inclusion <https://www.montgomerycountymd.gov/ore/Resources/Files/22-24.pdf>
2. REIA of Supplemental Appropriation #22-75 ARPA IDEA Early Intervention Grant <https://www.montgomerycountymd.gov/ore/Resources/Files/22-75.pdf>
3. REIA of Supplemental Appropriation #22-77 ARPA IDEA Part B1 Grant and SA#22-78 ARPA IDEA Part B2 Grant <https://www.montgomerycountymd.gov/ore/Resources/Files/22-77and22-78.pdf>
4. REIA of Supplemental Appropriation #22-93 MCPS Title I, Part A Grant <https://www.montgomerycountymd.gov/ore/Resources/Files/22-93.pdf>
5. REIA of Supplemental Appropriation #23-04 IFSP Infants and Toddlers Grant <https://www.montgomerycountymd.gov/ore/Resources/Files/23-04.pdf>
6. REIA of Supplemental Appropriation #23-14 FY23 DHHS, IECMHSS Grant <https://www.montgomerycountymd.gov/ore/Resources/Files/23-14.pdf>

The REIAs referenced above provide context regarding inequities in educational opportunities for MCPS children and families with special education needs. Because Supplemental Appropriation #23-85 serves to support the staff working with these children and families through salaries and employee benefits, ORESJ recommends reviewers consider the following:

¹ National Center on Birth Defects and Developmental Disabilities, Centers for Disease Control and Prevention. *Individuals with Disabilities Education Act (IDEA) Services*. 2022. Available at: <https://www.cdc.gov/ncbddd/cp/treatment.html#:~:text=Part%20B%20of%20IDEA%3A%20Services%20for%20School%20Aged%20Children&text=Among%20the%20services%20covered%20under,equipment%20or%20special%20communication%20systems>.

1. Students of color – particularly low-income Black students – are disproportionately represented in special education programs where academic outcomes are worse, expectations for success are lower, and the stigma associated with special education is higher.² In an effort to mitigate these poor outcomes, staff working with MCPS students served by IDEA Part B should be trained (and receive continuing education keeping up with best practices) to be culturally responsive to the students they serve. Training educators to be culturally responsive will help them recognize cultural characteristics of BIPOC students that in turn work to reduce misinterpretations that lead to children of color being disproportionately referred to special education.³
2. Research shows that BIPOC students perform better contemporaneously in school when they are exposed to teachers of the same race or ethnicity⁴—this includes other school staff that children of color interact with. Considering the vast diversity of MCPS students (as it relates to race, ethnicity, and primary language spoken in the home), it is imperative that earnest efforts be made in recruiting, training, and retaining qualified and effective special education staff who are both reflective of and culturally responsive to, the children in their care.
3. In addition to prioritizing culturally responsive staff reflective of the diverse MCPS students they work with, resources should be provided that facilitate family engagement efforts that prioritize parents and caregivers as partners in their child’s educational journey. This is especially imperative for children with special educational needs as students with disabilities often require a greater degree of parental involvement and advocacy than their peers without disabilities in order to be assured of receiving the same level of instruction as the general student population.⁵

cc: Dr. Monifa McKnight, Superintendent, Montgomery County Public Schools
Ken Hartman, Director, Strategic Partnership, Office of the County Executive

² Morgan, H. *Misunderstood and Mistreated: Students of Color in Special Education*. 2020. Available at: <https://files.eric.ed.gov/fulltext/ED610548.pdf>

³ Ibid.

⁴ Figlio, D. *The importance of a diverse teaching force*. 2017. Available at: <https://www.brookings.edu/research/the-importance-of-a-diverse-teaching-force/>

⁵ Ferrel, J. *Family Engagement and Children with Disabilities: A Resource Guide for Educators and Parents*. 2012. Available at:

<https://ctserc.org/documents/resources/Family%20Engagement%20and%20Children%20With%20Disabilities%20A%20Resource%20for%20Educators.pdf>